

REMARKS

Please reconsider the application in view of the above amendments and the following remarks. Applicant thanks the Examiner for carefully considering this application.

Disposition of Claims

Claims 1-21 were pending in this application. Claims 1-13 and 19 have been canceled by this reply, without prejudice or disclaimer. Of the remaining claims, claims 14 and 17 are independent. The remaining claims depend, directly or indirectly, from claims 14 and 17.

Claim Amendments

Independent claims 14 and 17 have been amended to recite, in part, a first and second driven member/holding means, where the second driven member/holding means is movable three-dimensionally and independently upon the first driven member/holding means. Further, independent claim 14 has been amended to recite a circular cross section wire member.

Applicant asserts that no new subject matter is added by way of these amendments. Support for these amendments may be found, for example, in Figure 8 and in paragraphs [0082] and [0095] of the Publication of the Specification (*i.e.*, U.S. Publication No. 2005/0242227).

Rejection under 35 U.S.C. § 102

Claims 1-21 stand rejected under 35 U.S.C. 102(b) as being anticipated by Japanese reference no. 63-195712 (hereinafter “Sharp”). Claims 1-13 have been canceled by this reply, thus this rejection is now moot with respect to claims 1-13. To the extent that this rejection may still apply to the remaining amended claims, this rejection is respectfully traversed.

For anticipation under 35 U.S.C. § 102, the reference must teach every aspect of the claimed invention either explicitly or impliedly. Any feature not directly taught must be inherently present. *See* MPEP § 2131. The Applicant respectfully asserts that Sharp does not disclose each and every element recited in the amended independent claims.

The amended independent claims of the present invention clearly require a second driven member that is three-dimensionally and independently movable over a first driven member (*see* Figure 8 and paragraphs [0082] and [0095] of the Publication of the Specification). Turning to the rejection of the claims, Sharp fails to disclose a second driven member (or a second holding means, as recited in independent claim 17) that is three-dimensionally movable independently over a first driven member (or a first holding means). Rather, Figure 1 of Sharp discloses a winding machine with a guide part (21a) and a pressing member (24). However, the guide part (21a) and the pressing member (24) are simply affixed to each other in Sharp. Sharp makes no mention of any type of independent movement that can be performed with respect to the guide part (21a) and the pressing member (24). Because it is clear that the guide part and the pressing member of Sharp are not independently movable upon each other, it follows that Sharp fails to disclose that a second driven member is *three-dimensionally and independently* movable over a first driven member. In fact, such a complicated three-dimensional motion of a second driven member independent of a first driven member is restricted by the winding machine shown in Sharp.

In view of the above, it is clear that Sharp fails to disclose each and every element of the claimed invention. Thus, amended independent claims 14 and 17 are patentable over Sharp. Dependent claims 15, 16, 18, 20, and 21 are patentable for at least the same reasons. Accordingly, withdrawal of this rejection is respectfully requested.

Conclusion

Applicant believes this reply is fully responsive to all outstanding issues and places this application in condition for allowance. If this belief is incorrect, or other issues arise, the Examiner is encouraged to contact the undersigned or his associates at the telephone number listed below. Please apply any charges not covered, or any credits, to Deposit Account 50-0591 (Reference Number 10122/008001).

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Respectfully submitted,

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